AND EXTEND DEADLINE TO RESPOND TO COMPLAINT

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# 275 Battery Street, Suite 2000 San Francisco, CA 94111 Gordon & Rees LLP

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#### TO THE HONORABLE COURT:

The parties hereto, Plaintiffs AVIATION WEST CHARTERS, LLC d/b/a ANGEL MEDFLIGHT and ERIN GAAL (collectively "Plaintiffs") and Defendant CONNECTICUT GENERAL LIFE INSURANCE COMPANY ("CIGNA"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs filed their Complaint on January 5, 2016, and served CIGNA with the Summons and Complaint on January 8, 2016.

WHEREAS, following joint stipulations, CIGNA's current deadline to file a response to the Complaint is March 2, 2016.

WHEREAS, the Parties have agreed to conduct an early mediation on March 31, 2016 with Judge Edward Infante (Ret.) to attempt to resolve this case and potentially resolve other, related claim disputes in their entirety.

WHEREAS, given the complexities of this case and the other disputes, the Parties agree that sufficient time should be allowed post-mediation to permit resolution efforts to continue and, if the Parties are unable to resolve their disputes, to allow CIGNA adequate time to prepare its response to the Complaint.

WHEREAS, the Plaintiffs have agreed to extend CIGNA's deadline to file a response to the Complaint to April 22, 2016, provided this date will not interfere with any deadline previously set by the Court.

WHEREAS, this Court scheduled the Initial Case Management Conference on Reassignment for April 14, 2016.

WHEREAS, the Parties request the Court to continue the Initial Case Management Conference to April 28, 2016 to complete early resolution efforts and, if these efforts are unsuccessful, to permit CIGNA to file a responsive pleading in advance of the Case Management Conference.

IT IS HEREBY STIPULATED by and between Plaintiffs and CIGNA through their respective counsel of record that the deadline for CIGNA to file a responsive pleading is

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# extended up to April 22, 2016, and that the Court continue the Initial Case Management 1 2 Conference to April 28, 2016. 3 IT IS SO STIPULATED 4 5 Dated: March 2, 2016 CARTER WOLDEN CURTIS, LLP 6 By /s/ Kirk J. Wolden 7 Kirk J. Wolden Attorneys for Plaintiffs 8 AVIATION WEST CHARTERS, LLC d/b/a ANGEL MEDFLIGHT and ERIN GAAL 9 10 Dated: March 2, 2016 GORDON & REES LLP 11 12 275 Battery Street, Suite 2000 By /s/ Jordan S. Altura San Francisco, CA 94111 Jordan S. Altura Gordon & Rees LLP 13 Tino X. Do Attorneys for Defendant CONNECTICUT GENERAL LIFE INSURANCE 14 **COMPANY** 15 16 17 18 19 20 21 22 23 24 25 26 27 28 Order re: Case No. 4:16-cv-00035-WHA JOINT STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

AND EXTEND DEADLINE TO RESPOND TO COMPLAINT

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**ATTESTATION OF E-FILED SIGNATURE** I, Jordan S. Altura, am the ECF user whose ID and password are being used to file this Joint Stipulation to Continue Initial Case Management Conference and Extend Deadline to Respond to Complaint. In compliance with Local Rule 5-1(i), I hereby attest that Kirk J. Wolden, counsel for Plaintiffs, has concurred in this filing. Dated: March 2, 2016 /s/ Jordan S. Altura Jordan S. Altura 275 Battery Street, Suite 2000 San Francisco, CA 94111 Gordon & Rees LLP Order re: 1114817/27000634v.1

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JOINT STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND EXTEND DEADLINE TO RESPOND TO COMPLAINT

# 275 Battery Street, Suite 2000 San Francisco, CA 94111 Gordon & Rees LLP

### **PROPOSED ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Initial Case Management Conference is continued to April 28, 2016 at 11:00 a.m. Not less than seven days prior, counsel shall submit a joint case management conference statement not to exceed ten pages.

IT IS FURTHER ORDERED that Defendant Connecticut General Life Insurance Company file its response to Plaintiffs' Complaint by April 22, 2016 in the event this case is not resolved at mediation.

Dated: March 10, 2016.

Hol. William Alsup United States District Judge

Order re:

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